



— CENTER FOR —
CONSTITUTIONAL LITIGATION
— A PROFESSIONAL CORPORATION —

March 30, 2020

Clerk of the Court
Supreme Court of the United States
1 First Street, N.E.
Washington, DC 20543

Re: *Airbus Helicopters, Inc. v. Riggs, et al.*, No. 19-1158

Dear Clerk of Court:

Pursuant to Supreme Court Rule 30.4, counsel for Respondents *Mary Riggs, as Personal Representative of the Estate of Jonathan Neil Udall, and Philip and Marlene Udall*, in the matter designated above, hereby requests that the time within which to respond to the petition for certiorari be extended 30 days, to and including May 22, 2020. Consent was requested of counsel for the Petitioner Airbus Helicopters, Inc., who consented to this request for a 30-day extension. The petition for certiorari in the above-entitled case was docketed on March 20, 2020, after Justice Kagan granted Petitioner an extension from February 19, 2020 to March 20, 2020. Absent an extension, the Brief in Opposition would be due April 22, 2020.

This request will not prejudice Petitioner's interests and is made necessary for following reasons:

1) The time to draft the brief in opposition coincides with a number of other judicial proceedings and briefs for which Counsel of Record is responsible for, including a supplemental brief in *In re: Volkswagen "Clean Diesel" Marketing, Sales Practices, and Products Liability Litigation*, Case No. 3:15-md-02672-CRB, due today in the U.S. District Court for the Northern District of California; an *amicus curiae* brief in *Ford Motor Co. v. Montana Eighth Jud. Dist. Ct./Ford Motor Co. v. Bandemer*, Nos. 19-368 & 19-369, due April 7, 2020 in this Court; an opening brief in *Pedante v. Ford Motor Co.*, No. 19-56530, due April 9, 2020 in the U.S. Court of Appeals for the Ninth Circuit; and a motion to dismiss several affirmative defenses in *J.S. v. Winchester Pediatric Clinic, P.C.*, Case No. 5:19-cv-00097-MFU, due April 24, 2020 in the U.S. District Court for the Western District of Virginia.

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2) A 30-day extension will not prejudice Petitioner's interests. Petitioner does not object to Respondents' request for this extension. Thirty days is appropriate for this matter.

For the foregoing reasons, Respondents respectfully request a 30-day extension in which to file a brief in opposition.

Sincerely,

A handwritten signature in cursive script that reads "Robert S. Peck".

Robert S. Peck
Counsel of Record
CENTER FOR CONSTITUTIONAL
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cc: Carter G. Phillips, *Counsel for Petitioner*